



County of San Diego

DEPARTMENT OF PUBLIC WORKS

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John Minan
California Regional Water Quality Control Board
San Diego Region 9
9174 Sky Park Court, Ste. 100
San Diego, CA 92123-4340

Dear Chairman Minan and Members of the Board:

This letter provides County of San Diego (County) comments on the proposed Total Maximum Daily Load (TMDL) for Total Nitrogen and Phosphorous in Rainbow Creek. Information is first provided in response to questions and concerns raised at the December 8, 2004 Regional Water Quality Control Board (RWQCB) meeting. The County has also provided detailed comments and suggested edits to draft TMDL Sections 8, 9, and 10. This latter input was initially requested during an October 21, 2004 meeting of RWQCB and County staff, but was not yet available at the December 8 meeting. Thank you again for extending the written comment period to allow the County to provide this additional input. We believe that in combination with the County's December 8 comment letter, this documents all of our major issues and concerns with the TMDL as currently drafted. We welcome additional dialogue with you or your staff on this matter if that will help to resolve these issues.

A. Information Provided in Response to the December 8, 2004 RWQCB Meeting

The following addresses issues or informational requests raised at the December 8 meeting of the RWQCB.

1. County MS4 Map

RWQCB staff indicated that although a Waste Load Allocation (WLA) was issued to CALTRANS, one was not given to the County. The reason stated by staff was that the County did not provide a Municipal Separate Storm Sewer System (MS4) map or the

data necessary to calculate the WLA¹, whereas CALTRANS had provided this information. At that time, staff also indicated that Section C.2.a of the MS4 Permit already contains requirements for the iterative application of BMP programs. Two County MS4 maps (with and without land uses) for the Rainbow Creek Watershed are attached to this submittal². The County has no specific objection to the assignment of a WLA for those portions of the Rainbow Creek Watershed tributary to its MS4. However, as is evidenced in the attached maps, the presence of an MS4 in this Watershed is limited and often not continuous. As a practical matter, this would likely make assigning, managing to, and verifying compliance with numeric allocations problematic. Regardless of whether a WLA is issued to the County, we intend to control discharges into and from our MS4 in support of the attainment of this TMDL.

2. Notification of Residents

In response to RWQCB members' request that additional effort be made to notify residents / property owners of the requirements of this TMDL, the County received a request for contact information from RWQCB staff on or about December 10. A list of property owners, including contact information, was emailed to Benjamin Tobler on December 13.

3. Management Agency Agreement (MAA)

At the December 8 meeting, RWQCB staff member Carlisle responded to the County's assertion that the Management Agency Agreement (MAA) should be developed prior to the adoption of the TMDL by stating that, since the MAA is part of the implementation process, it doesn't need to be addressed prior to TMDL adoption. While this may be technically correct, it fails to recognize the central role of this agreement in ensuring successful implementation of the TMDL, or to consider how this and other key milestones in this process might best be sequenced (i.e., MMA drafting, TMDL adoption, MAA adoption, Nutrient Reduction and Management Plan [NRMP] submittal and implementation, etc.). The County considers the MAA the primary vehicle for defining the roles, responsibilities, and specific commitments of both parties in implementing this TMDL. Until such a document exists, at least in draft form, we cannot be sure that either party understands the expectations or likely commitments of the other. As agreed in informal discussions with RWQCB staff, the County is taking the lead on developing a first draft of this document.

¹ A request for MS4 maps was received from Benjamin Tobler on November 11, 2004. However, that message only indicated that RWQCB staff would "be very interested in reviewing" these maps. Had we known that the RWQCB intended to calculate a WLA, this information could have been provided sooner.

² These maps are also provided electronically in an Adobe Acrobat format that allows the user to zoom in or out depending on the level of detail desired.

With respect to MAA content and purpose, it is worth noting that the apparent position of RWQCB staff is that the MAA should define additional commitments by the County over and above the prescriptive compliance assurances already written into Section 9.7 (County of San Diego Nutrient Reduction and Management Plan). The County maintains that such an approach would be unsupported by statute (see specific comments on the limitations of the RWQCB's California Water Code [CWC] §13225(c) authority below), and would negate the stated purpose of the MAA. The County is willing to consider drafting the MAA after TMDL adoption, but will have no reason to consider entering into a MAA or any other agreement should the prescriptive language currently contained in Section 9.7 remain as is.

4. Septic Moratorium Issues

RWQCB member Anderson asked for clarification on whether a moratorium still existed on septic systems in Rainbow Valley, and whether it is true that leaking septic systems cannot be repaired.

The septic "moratorium" in Rainbow Valley consists of a policy that evolved in two steps. In 1966, a memo was written by Bill Walsh, Chief, Division of Sanitation to J.B. Askew, Director of Public Health recommending a curtailment of building in the Rainbow Valley area due to the high groundwater conditions that existed. This memo required that prior to the approval of a building permit or issuance of a septic permit, the applicant would have to demonstrate that groundwater is not within eight feet of the ground surface. The area delineated was between 1st Street on the north, 8th Street on the south, U.S. 395 (now I-15) on the west and the end of 5th Street on the east. A map was prepared at that time, with the area affected generally below the 1080 contour line. In practice, this policy turned out to be faulty in that a person could drill a hole in the summer and show no groundwater at 8 feet, but this did not take the seasonal variation of groundwater levels into account.

In 1970, a memo was written to change the 1966 recommendation to a prohibition of subsurface sewage disposal systems within this area since the area in question generally could not meet the groundwater separation requirement especially with the seasonal variations observed. This "moratorium" by policy has always been enforced case by case. If an applicant could demonstrate that their site could meet applicable requirements for the separation to historic high groundwater levels, development could be approved based on the use of a septic system.

Septic repairs in this area have also always been reviewed case by case. Depending on the site, the County has allowed gravity flow repairs, repairs that involve the sewage being pumped to shallow trenches or the system being converted to a holding tank during the peak groundwater periods such as is the case with the Rainbow Valley

School. With the upcoming AB 885 regulations (CWC §13291), repairs will likely require the use of advanced treatment with possible disinfection. As stated in TMDL Section 8.3.2 (Proposed Regulations for Onsite Wastewater Treatment Systems), the RWQCB intends to pursue delegation of its AB 885 responsibilities to the County. Should the RWQCB and the County fail to come to agreement, these new regulations would require the RWQCB to issue waste discharge requirements for all Onsite Wastewater Treatment Systems beginning on January 1, 2009.

5. County Commitments beyond those Legally Required

RWQCB member Wright requested further explanation from the County on how expected commitments might exceed our strict legal obligations under the TMDL. The County's concerns generally relate to two issues. First, as described further below (comment A.6), we believe that the RWQCB has exceeded the authority granted it under CWC §13225(c) by imposing a requirement for the County to submit and implement a NRMP. Since Section 9.6 (County of San Diego Nutrient Reduction and Management Plan) includes prescriptive requirements that the County believes it cannot legally be compelled to implement (see also comment A.3 above), our position is that a commitment on our part to undertake any of these activities would be above and beyond our strict legal obligations. Our second concern relates to the intended purpose and specific content of the MAA. Although RWQCB Counsel correctly indicated in his response to Dr. Wright that voluntary actions would be included in the MAA, and that these would be negotiated after the TMDL is adopted, Mr. Richards failed to note that this would occur only after prescriptive requirements are imposed in the TMDL document pursuant to §13225(c). In the County's view, any commitments in excess of our strict legal obligations must be negotiated during the development of the MAA. We therefore believe that such requirements cannot be contained in the TMDL document since its adoption will precede the adoption of the MAA. Most of the specific comments provided by the County in this and our previous letter are intended to address this discrepancy.

6. Application of CWC §13225(c)

As stated in its December 8 letter, the County has consistently maintained its willingness to voluntarily submit a NRMP. However, we respectfully disagree that CWC §13225(c) can reasonably be interpreted to authorize the RWQCB to compel the County to do so. It is important to emphasize that failure to come to agreement on this point may result in the withdrawal of County support for the proposed TMDL, and may also limit the scope of the County's involvement in its implementation.

Section 13225(c) provides that the RWQCB shall:

"Require as necessary any state or local agency to investigate and report on any technical factors involved in water quality control or to obtain and submit analyses of water; provided that the burden, including costs, of such reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained therefrom."

The County is aware of no precedent in which a court has interpreted the provisions of §13225(c). Nevertheless, we believe the plain language of the statute cannot reasonably be construed to authorize the imposition of a NRMP.

The statute authorizes the RWQCB to require the County to investigate, report on and analyze water quality factors, but those terms do not describe the NRMP. Rather than requiring investigation and analysis, the NRMP, as currently described in the TMDL, requires the County to police, oversee, and manage the non-point sources in the Rainbow Creek Watershed and to use all of the tools at its disposal to effect a reduction in nutrient levels in the runoff from those non-point sources.

For example, the TMDL states that, in implementing the NRMP, the County shall utilize its legal authority "to mandate compliance with nutrient load reductions specified in this TMDL," and to "control" and "prohibit" discharges of nutrients. It requires the County to modify its General Plan "to ensure that future land use and zoning decisions do not result in increases in the nutrient loading to Rainbow Creek." It requires the County to modify its project approval process "to ensure that discharges from proposed developments in the Rainbow Creek watershed will comply" with the TMDL and to "ensure that water quality objectives are not exceeded." Similarly, the TMDL requires the County to revise its CEQA process to "ensure" the same nutrient reduction goals.

The TMDL further requires the County to "implement pollution prevention methods for nutrients" at County owned sites. It requires the County to "develop and update annually an inventory of the individual nutrient sources" within the identified non-point sources and "[t]o establish priorities for oversight activities." It requires the County to designate minimum management measures and management practices for the identified non-point sources and to "enforce its ordinances, statutes, permits, and contracts as necessary to attain compliance" with the TMDL. The TMDL even requires the County to "develop educational programs to raise community awareness of the nutrient impairment problem."

As this language demonstrates, the NRMP does not consist of investigation and analysis; it consists almost entirely of policing, oversight and management. In short, the NRMP is precisely what its name implies - a plan for the reduction and management of nutrients. CWC §13225(c) does not authorize the imposition of such a plan. For these reasons, the County respectfully submits that the statute does not authorize the

RWQCB to insist the County prepare and submit the NRMP. The County is willing to do so voluntarily; however, it cannot be compelled to do so.

On a related note, even in those instances where §13225(c) authorizes the RWQCB to require certain investigations or analyses, e.g., for water quality investigations or monitoring, the statute requires that the burden, including costs, of those investigations or analyses bear a reasonable relationship to the benefits to be obtained. The County submits that such a costs/benefits analysis must be provided in writing, and must identify the evidence supporting the analysis, before the identified investigations or analyses may be required. See, e.g., CWC § 13267(b)(1), containing a nearly identical costs/benefits provision and requiring that the analysis be in writing with supporting evidence identified.

The County believes the written, evidence-supported costs/benefits analysis for the §13225(c) orders referenced in the TMDL should be included in the text of the TMDL. While TMDL Section 12.2 does provide some very basic information on implementation costs, this analysis is clearly not sufficient to meet these § 13225(c) obligations. Although the TMDL only contemplates future orders to the County, the TMDL assumes such orders will be issued and that the County will comply with them. Consequently, waiting until after the TMDL is approved to develop the required costs/benefits analyses will only guarantee that such analyses amount to little more than post hoc rationalizations in support of orders that are, in fact, a fait accompli. This result should be avoided. Section 13225(c) orders should only be issued with a clear understanding of how the benefits of the required investigations justify their costs.

B. Specific Comments on Draft TMDL Sections 8, 9, and 10

The County has focused its comments on the three draft TMDL sections it believes to be most crucial for addressing its concerns: Sections 8, 9, and 10. Because these suggested changes are extensive, we have not attempted to make parallel edits in earlier sections of the TMDL. To maintain consistency with changes that are made to TMDL Sections 8, 9, and 10, the RWQCB will therefore need to make corresponding edits to Resolution No. R9-2004-0401 and other TMDL sections as applicable.

TMDL Section 8 Legal Authority and Regulatory Framework

1. Section 8.3.1 (line 215)

A footnote has been added to clarify that the County's role in implementing a third party agreement would be independent of its obligations as a municipal stormwater discharger. This is in response to the opinion expressed by RWQCB staff that third-party agreements should be limited to entities that are not dischargers.

2. Section 8.3.2 (lines 265-267)

This list of source categories is edited to make each plural. This is consistent with the sub-section headings used below.

3. Section 8.4 (line 414)

A hyphen has been added to the title for consistency with the spelling used below the heading.

4. Section 8.4.2 (lines 454-457)

Changes to this paragraph reflect the County's position that the RWQCB can only request that we enter into a MAA. We have also replaced "mandate" with "achieve" in the first sentence to better reflect the range of activities likely to be conducted (e.g., education, compliance, etc.). The MAA should not be characterized as a tool for mandating compliance.

5. Section 8.4.2 (lines 461-471)

Changes here are similar to the previous paragraph. The fourth sentence is deleted because it incorrectly implies that staffing and financial limitations apply only to the RWQCB.

6. Section 8.4.2 (lines 478-484)

These changes clarify that the RWQCB will have responsibility to participate in the implementation of the TMDL prior to a perceived failure by the County to achieve desired results. The County fully expects that the RWQCB will be an active partner in enforcing the provisions of this TMDL as set out in the MAA or otherwise requested. The second sentence is also amended to differentiate between the County's compliance obligations as a discharger and as a lead agency under the MAA.

7. Footnote 25 (under line 483)

The County recommends deletion of this footnote. It is problematic for two reasons. First, it implies that CWC § 13225 provides authority for the RWQCB to enter into a MAA. While the County does not dispute that the RWQCB possesses authority to enter into such an agreement, this issue is in no way addressed in CWC § 13225. Further, the first sentence of the footnote seems to imply that RWQCB authority extends to the requirement of local agencies to enter into such an agreement, which it clearly does not. The remainder of the footnote also provides a rather loose interpretation of RWQCB

CWC § 13225 authority to require the submission of technical reports on water quality, even going so far as to suggest that this authority extends to the characterization of potential practices and control measures. If additional interpretation of RWQCB CWC § 13225 authorities is needed, a footnote is not an appropriate place to do this.

8. Section 8.4.3 (lines 536-7) and Footnote 27 (below line 569)

These two edits were made because this text implies that something as specific as controlling nutrient discharges would be appropriately addressed as a new element in the County's General Plan.

TMDL Section 9 Implementation Action Plan

9. Section 9.5.2 (lines 120-129)

Section title and textual changes have been made to reflect that the NRMP will be requested of the County rather than directed pursuant to CWC §13225(c). As described above, the County disagrees that §13225(c) provides the RWQCB the authority to impose either the development or the implementation of this plan.

The last sentence of this section is also amended to clarify that alternative elements should support attainment of the TMDL objectives (i.e., nutrient loading reductions and eventual attainment of water quality standards) rather than equivalency to other explicitly stated requirements of TMDL Section 9.7. There is no basis for asserting that alternative elements should meet a standard of "equivalency" since any specific elements prescribed in TMDL Section 9.7 will necessarily be subject to interpretation and an iterative review and amendment process. Since the activities and programs prescribed in Section 9.7 are not static, they should not be presented as constituting a standard of compliance.

10. Section 9.5.2 (lines 133-138)

The first sentence is amended to delete the requirement for submission of a NRMP by the County prior to RWQCB consideration of entering into a MAA. The County believes that the MAA should be developed, and preferably adopted by both parties, prior to the submission of the NRMP. This is crucial since the content of the NRMP will largely reflect the understanding reached regarding the respective roles and responsibilities of both parties.

The last sentence of this section is amended to more accurately reflect the County's role in implementing the NRMP. As previously worded, it appeared that only the County would have implementation responsibilities.

11. Section 9.5.3 (lines 140-146)

This section is added for consistency with the addition of compliance monitoring requirements to Section 9.6 (see below for an explanation of that change).

12. Section 9.6.1 (lines 150-157)

This section is amended to reflect the obligation of the RWQCB to justify the need for this monitoring.

13. Section 9.6.1 (lines 228-243)

This text is added to provide a general overview of the elements that the County would reasonably be expected to utilize in managing nutrient discharges from its MS4 to Rainbow Creek. The County has previously acknowledged the presence of a MS4 in the Rainbow Creek Watershed, and its obligation to control such discharges. With some modification, this list reflects the general content previously contained in Section 9.7 (County of San Diego Nutrient Reduction and Management Plan). As previously stated, the County believes that the RWQCB lacks sufficient authority under CWC §13225(c) to require such content in the NRMP.

14. Section 9.6.2 (lines 246-252)

This section is amended to reflect that the County will be requested, rather than directed, to prepare and submit a NRMP. As is also explained in Comment 9, this section is amended to remove the requirement of alternative elements to be “equivalent” to the existing elements of Section 9.7.

15. Section 9.6.3 (lines 260-276)

This section includes several suggested changes, the most important being to 3.c. This change is intended to more accurately reflect the responsibilities of both parties in considering and/or making changes to the work plan. The County has also removed the specific requirement to implement the work plan within 60 days of submission. Since the work plan does not yet exist, it is premature to speculate on what should be a reasonable time frame for either beginning or completing its implementation. The County also believes that any timeframe contemplated should take the need for RWQCB review and approval into account.

The last sentence of this section is also deleted. The County has previously stated its position that RWQCB requirements must satisfy the requirements of CWC § 13225(c) to

show that the burden of this work bears a reasonable relationship to the need for the information and the benefits to be obtained it. This statement was removed because it implies that RWQCB authority to mandate changes to the work plan during implementation is absolute.

16. Section 9.6.4 (lines 281-312)

The section is amended to reflect a consultation process with the RWQCB in determining both the need for groundwater monitoring, and details of such a program if initiated. The County does not believe that groundwater monitoring should be a priority focus of this TMDL because it will not measurably improve our ability (1) to develop and implement effective management strategies, (2) to measure the effectiveness of those efforts in reducing nutrient loadings, (3) or to monitor improvements to the quality of creek water³. We believe that the RWQCB has not yet met its CWC §13225(c) obligation to justify the need for such monitoring, and as such groundwater monitoring should only be described as a potential activity in the TMDL. Because of this, the County's edits also include deletion of each of the specific elements listed in that section.

To further support the County's position that groundwater monitoring is of limited use to the implementation of this TMDL, we would also point out that previous efforts to decrease nitrate concentrations in Rainbow Creek from peak levels measured in the 1980s have been successfully implemented and verified through a surface water monitoring program⁴. This is encouraging both from the standpoint that significant gains can be expected through the application of aggressive outreach efforts, and that simple and straightforward monitoring approaches are likely to provide the necessary feedback for measuring the success of TMDL implementation. The additional imposition of a groundwater monitoring program, while of potential interest to RWQCB staff, does not appear to be a necessary component of this TMDL. Since this need has not yet been conclusively demonstrated, it should not be assumed that groundwater monitoring is needed for successful TMDL implementation.

17. Section 9.6.5 (lines 315-320)

³ The County has significantly increased its commitment to surface water monitoring in Rainbow Creek over the past two years. We believe the additional information provided through these and other changes to be made over the course of this TMDL will continue to support attainment of these objectives.

⁴ Focused outreach and education has been shown to be an effective means of reducing nutrient inputs into Rainbow Creek. Previous outreach efforts in Rainbow Creek watershed implemented by the Mission Resource Conservation District (MRCD) using 319(h) funding were highly successful in reducing nutrient levels in Rainbow Creek. The draft TMDL Staff Report cites historical data documenting a 96% decrease in nitrate levels at the Willow Glen station on Rainbow Creek, attributable in large degree to the outreach efforts of the MRCD with the assistance of Camp Pendleton during the 1990's (San Diego RWQCB, 2002).

This section is added because it has been deleted from Section 9.7 (County of San Diego Nutrient Reduction and Management Plan). The reason for this move is to separate these monitoring requirements from the NRMP, which the County maintains cannot be required under CWC §13225(c). By making this move, the County has acknowledged the RWQCB's authority to require monitoring investigations under that section.

18. Section 9.6.5 (lines 326-332)

Changes to this section clarify the role of the MAA both in implementing the TMDL, and in defining the obligations of the County and the RWQCB in that process. The County believes the MAA, as a formal and negotiated agreement, should take precedence if any conflicts or inconsistencies arise between the two documents. Since this would not in any way limit the RWQCB's ability to exercise its authority under CWC §13267 or §13225(c) as needed, this change simply underscores the commitment of both parties to jointly achieve the objectives of the TMDL.

19. Section 9.7 (lines 336-338)

This introductory language is added to clarify that the RWQCB will request, rather than require, the development of a NRMP by the County.

20. Section 9.7.1 (lines 342-487)

This section is amended to provide what the County believes to be a reasonable description of the types of activity that a NRMP should address⁵. Since the County will ultimately develop this plan in cooperation with other stakeholders and interested parties, we believe it is premature to speculate on detailed content. Lines 366 through 487 are struck because the County believes the RWQCB lacks the authority to prescribe these requirements. In addition, we believe that to do so would be to lose sight of the overall objective of collaboratively developing and implementing the NRMP. As currently drafted, this section gives the impression that the only party with responsibilities for TMDL development or implementation is the County.

21. Section 9.7.2 (lines 490-495)

This section is retained with the clarification that the County is requested, rather than required, to conduct community outreach.

22. Section 9.7.4 (lines 503-523)

⁵ Although not at the same level of prescription, the County has re-located most of these elements in Section 9.6.1 (Control MS4 Discharges to Rainbow Creek).

This section is retained with the clarification that the County is requested, rather than required, to develop and implement an effectiveness assessment strategy. The list of required elements is also replaced with a clearer description of the objectives of the assessment. Finally, a statement is added that allows the assessment to be included in the annual report rather than as a stand-alone document.

23. Section 9.7.5 (lines 526-550)

This section is retained with the clarification that the County is requested, rather than required, to submit annual reports. Additional changes are to describe suggested annual report content, and to allow the County the discretion to develop the report content and organization.

24. Footnote 21 (below line 564)

This footnote is added to make necessary distinction between annual and long-term assessment elements.

25. Section 9.8 (line 573)

“[A]s appropriate” has been added to the requirement of dischargers to implement pollution prevention methods. The County’s experience in implementing its municipal stormwater programs has shown that pollution prevention methods, while generally desirable, are not always appropriate or achievable.

26. Table 9.4

All table edits are for consistency with other amendments.

TMDL Section 10 Implementation Monitoring Plan

27. Section 10.1 (line 43)

This edit corrects an incorrect CWC citation.

28. Section 10.2 (lines 60-65)

Consistent with edits to Section 9 discussed above, this change would require that a need for groundwater monitoring be determined prior to the imposition of such requirements. It also clarifies the RWQCB’s CWC §13225(c) requirement to justify the need for this monitoring.

29. Section 10.5.2 (lines 141-143)

Additional text is to clarify that this requirement applies only if groundwater monitoring has been determined necessary.

30. Section 10.5.4 (lines 154-164)

As above, this paragraph is edited to clarify that this requirement applies only if groundwater monitoring has been determined necessary. Unnecessary detail on the placement of monitoring wells has also been struck.

31. Section 10.5.5 (lines 170-171)

The last sentence is amended to provide the ability to propose other monitoring parameters so long as adequate justification is provided.

32. Section 10.5.6 (lines 174-179)

As above, edits are to clarify that this requirement applies only if groundwater monitoring has been determined necessary. The last sentence is amended to provide the ability to propose other monitoring parameters so long as adequate justification is provided.

33. Table 10.1 (below line 238)

The title of the table is changed from "Required" to "Recommended". This is consistent with previous comments.

Thank you again for the opportunity to provide input into this process. The County realizes that its comments are extensive; however, we request that staff's response to these and other comments be completed and made publicly available as early as possible. A February 2005 TMDL adoption is aggressive given the significance of these outstanding issues. The County is hopeful that staff's response will convey a commitment to change in several key areas of the TMDL, rather than a rationalization of existing requirements. We believe that such changes will measurably increase the likelihood of successful TMDL implementation.

We hope that these comments will facilitate such change, and look forward to continued interaction with you and your staff. We will also be available at your February meeting should you have additional questions at that time. If you have any questions or need additional information, please contact me, at (858) 495-5133.

Chairman Minan
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December 28, 2004

Sincerely,

JON VAN RHYN, Water Quality Program Manager
Department of Public Works

JVR/elz

attachments: Rainbow Creek MS4 maps (w/ and w/out land use)
County of San Diego Specific Comments on Rainbow Creek TMDL
Sections 8, 9 & 10

cc: Linda LeGerrette, RWQCB
Janet Keller, RWQCB
Jennifer Kraus, RWQCB
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Alan Barrett, RWQCB
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